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10 **Attorneys for Defendant NEC**  
11 **ELECTRONICS AMERICA, INC.**

12 **IN THE UNITED STATES DISTRICT COURT**

13 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

14 **CRAGO CORPORATION, individually and on**  
15 **behalf of all those similarly situated,**

16 **Plaintiff,**

17 **v.**  
18 **LG PHILIPS LCD CO., LTD., et al.,**

19 **Defendants.**

20 **Case No.: 06-cv-07644 MMC**

21 **STIPULATION AND [PROPOSED]**  
22 **ORDER TO EXTEND INITIAL**  
23 **SCHEDULING DATES**

1 WHEREAS plaintiff filed a complaint in the above-captioned case on or about December 13,  
 2 2006 ("Complaint");

3 WHEREAS Plaintiff alleges antitrust violations by manufacturers of Liquid Crystal Display  
 4 ("LCD") products;

5 WHEREAS more than sixty complaints, including this action, have been filed to date in  
 6 federal district courts throughout the United States by plaintiffs purporting to bring class actions on  
 7 behalf of purchasers alleging antitrust violations by manufacturers of LCD products (collectively,  
 8 "the LCD Cases");

9 WHEREAS there are motions pending before the Judicial Panel on Multidistrict Litigation  
 10 ("JPML") to transfer the LCD Cases for coordinated or consolidated pretrial proceedings pursuant to  
 11 28 U.S.C. § 1407;

12 WHEREAS the parties anticipate the possibility of consolidated amended complaints in the  
 13 LCD Cases;

14 WHEREAS on February 7, 2007, the Court issued an Order extending the deadline for  
 15 Defendant LPL America (and any other defendant who notified Plaintiff by letter that they were  
 16 joining in the extension without making a formal appearance) to respond to the Complaint until the  
 17 earlier of the following dates: (1) forty-five days after the filing of Consolidated Amended  
 18 Complaint(s) in the transferee court in which the LCD Cases are consolidated by the JPML; or (2)  
 19 forty-five days after plaintiffs provide written notice to LPL America that they do not intend to file a  
 20 Consolidated Amended Complaint, provided that such notice may be given only after the initial case  
 21 management conference in the MDL transferee court in this case (collectively, the "Stipulated  
 22 Complaint Response Deadline");

23 WHEREAS the parties agree that it would be a more efficient use of the resources of the  
 24 parties and this Court to postpone the initial case schedule set forth in the Court's January 23, 2007  
 25 Case Management Conference Order, until after the filing of any amended complaint and  
 26 consolidation and transfer by the JPML, or after the JPML denies all motions to transfer for  
 27 coordinated or consolidated pretrial proceedings involving this action;

28 WHEREAS on February 21, 2007, the Clerk for the United States District Court for the

1 Northern District of California issued an Order, attached hereto as Exhibit A, that extended Judge  
2 Illston's case management deadlines in the LCD Cases pending in that Court and set an initial case  
3 management conference for June 8, 2007;

4 WHEREAS the parties agree that the case management deadlines for this action set forth in  
5 this Court's Case Management Conference Order should be similarly extended in the manner set  
6 forth in the Stipulation below;

7 WHEREAS this Stipulation does not constitute a waiver by NEC Electronics America, Inc.  
8 or any defendant of any defense, including but not limited to the defenses of lack of personal or  
9 subject matter jurisdiction, insufficiency of process, insufficiency of service of process, or improper  
10 venue.

11 PLAINTIFF AND DEFENDANT NEC ELECTRONICS AMERICA, BY AND THROUGH  
12 THEIR RESPECTIVE COUNSEL OF RECORD, HEREBY STIPULATE AND AGREE AS  
13 FOLLOWS:

14 1. The Case Management Conference, originally set for March 30, 2007, shall be  
15 extended until June 8, 2007, at 10:30 a.m. All other deadlines set forth in the Court's January 23,  
16 2007 Case Management Conference Order are likewise extended to reflect a new Case Management  
17 Conference date of June 8, 2007.

18 2. The extensions to the Case Management Conference Order deadlines set forth in this  
19 Stipulation apply to the case schedule for the entire action and thus to any other parties that may  
20 appear in this action.

21 IT IS SO STIPULATED.

22 **DUANE MORRIS LLP**  
23 Attorneys for NEC Electronics America, Inc.

24 Dated: March 5, 2007

25 By: /s/  
26 George D. Niespolo  
27 Stephen H. Sutro

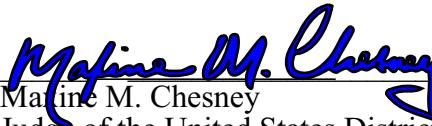
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SAVERI & SAVERI INC.  
Attorneys for Crago Corporation

Dated: March 5, 2007

By: /s/  
Guido Saveri  
Richard Alexander Saveri  
Cadio Zirpoli

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

Dated: March 9, 2007

By:   
Marlene M. Chesney  
Judge of the United States District Court